

# EXHIBIT C

NOTICE OF CLAIM

-----X  
Christopher J. Garry

Claimant,

- against -

CITY OF NEW YORK; NEW YORK CITY  
DEPARTMENT of EDUCATION,

Defendants  
-----X

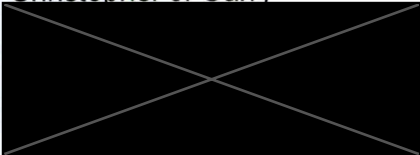
To: Office of the City Comptroller  
Bureau of Law and Adjustment  
1 Centre Street, Room 1225  
New York, New York 10007

Hon. Sylvia O. Hinds-Radix  
Corporation Counsel  
New York City Law Department  
100 Church Street  
New York, New York 10007

New York City Department of Education  
52 Chambers Street  
New York, N.Y. 10007

PLEASE TAKE NOTICE that the Claimant hereby makes claim and demand against the individuals and groups named in the caption above:

1) Christopher J. Garry



2) The nature of the claim:

This claim seeks recovery for monetary damages and backpay plus interest for the harm caused to Claimant's reputation, livelihood, and career; additionally for the distress, suffering, mental, emotional, and physical anguish and impairment of Claimant's ability to secure future employment, and impairment of earning power inflicted upon the Claimant due to the negligence, carelessness, recklessness, and misfeasance, malfeasance, and negligent acts practices, and/or omissions of the Defendants. Claimant's rights under the Constitution, both Federal and State, city and State Human Rights Laws, NYS Administrative Code, as well as

NYC COMPTROLLER  
BUREAU OF INFORMATION SYSTEMS  
RECEIVED FACILITY  
2023 MAY -9 P 9:09

OFFICE OF LEGAL COUNSEL  
2023 MAY -3 PM 12:21

employment rights under current contracts. The claimant now seeks to be made whole.

3) Claimant was wrongfully put on Leave Without Pay on October 4, 2021 and wrongfully terminated by the NY City Department of Education on February 11, 2022.

On February 10, 2023, the NYC Department of Education's COVID Mandate was ended by Mayor Eric Adams. The claimant has sent out emails to the employer requesting reinstatement and/or backpay, and has received either no answer or, that Claimant cannot get backpay or return to a job with the same salary. The claimant objects to this punishment as unlawful.

On or about February 10, 2023 Claimant became aware that their fingerprints remained tagged in the New York City Department of Education's 'Problem Code' at the Human Resources Office of Personnel Investigations, but was never told why. The 'Problem Code' is used for employees who have committed what the New York City Department of Education considers misconduct. Therefore the New York City Department of Education has considered Claimant guilty of some kind of misconduct without giving the Claimant a chance to clear the codes from the personnel file and database.

At present Claimant remains coded for an unknown act of misconduct, with a career that has been broken and tarnished by the unlawful acts cited herein.

4) The items of damage or injuries claimed are:

damages to reputation; emotional distress; impairment of Claimant's ability to secure future employment; impairment of earning power; tortious interference with business relations; malicious prosecution; abuse of process; fraud; and retaliation, defamation, libel, and slander. The claimant remains targeted, ostracized, and punished for not getting the COVID vaccine. The claimant demands that all rights to due process be honored and Claimant is made whole.

The Department has criminalized Claimant's rights to due process. The items of damage or injuries claimed amount to \$2 million dollars

The claim and demand are hereby presented for adjustment and payment.

PLEASE TAKE FURTHER NOTICE that by reason of the foregoing, in default of the City of New York and the listed Defendants to pay the Claimant within the time limit for compliance with this demand by the applicable statutes, Claimant intends to commence an action against the City of New York and the listed Defendants to recover damages with interest and costs.

Dated: 05/01/2023

Christopher J. Garry

Claimant's name

Christopher J. Garry

Signed Before Me on 05/01/2023

*[Signature]*

Notary Public

HSI-CHI WU  
Notary Public, State of New York  
No. 01WU6023925  
Qualified in Queens County  
Commission Expires May 3, 2027



NOTICE OF CLAIM

-----X

NAME

Dianne Baker-Pacius,

- against -

CITY OF NEW YORK; NEW YORK CITY  
DEPARTMENT of EDUCATION,

Defendants

-----X

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Bureau of Law and Adjustment  
1 Centre Street, Room 1225  
New York, New York 10007

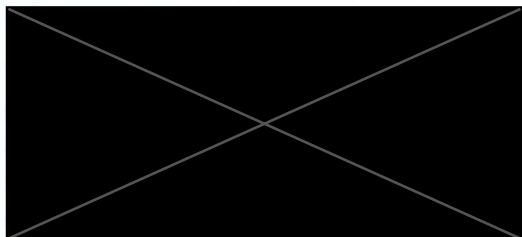
Hon. Sylvia O. Hinds-Radix  
Corporation Counsel  
New York City Law Department  
100 Church Street  
New York, New York 10007

New York City Department of Education  
52 Chambers Street  
New York, N.Y. 10007

PLEASE TAKE NOTICE that the Claimant hereby makes claim and demand against the individuals and groups named in the caption above:

1) The name, post office address, email and phone number of claimant:

Dianne Baker-Pacius



2023 MAY 10 PM 1:11  
NYC COMPTROLLER  
BUR. INFORMATION SYSTEM  
CENTRAL IMAGING FACILITY  
RECEIVED  
2023 MAY 12 P 3:57



2) The nature of the claim:

This claim seeks recovery for monetary damages for the harm caused to Claimant's reputation, livelihood, and career; additionally for the distress, suffering, mental, emotional, and physical anguish and impairment of Claimant's ability to secure future employment, and impairment of earning power inflicted upon the Claimant due to the negligence, carelessness, recklessness, and misfeasance, malfeasance, and negligent acts practices, and/or omissions of the Defendants. Claimant's rights under the Constitution, both Federal and State, city and State Human Rights Laws, NYS Administrative Code, as well as employment rights under current contracts. The claimant now seeks to be made whole.

3) The time when, the place where, and the manner in which the claim arose:

- On January 31, 2022, I received a termination notice from the NYCDOE Division of Human Resources stating that I would be terminated on February 11, 2022 because of not having received the COVID mandated vaccination and being denied religious exemption in 2021.
- On February 11, 2022, I was terminated from my teaching position by the City of New York City Department of Education via email.
- On or about April 28, 2022, the New York City Department of Education sent an email to Beth Norton at the UFT saying that any request for an exemption from taking the vaccination immediately placed the member's fingerprints into the 'Problem Code' at the Human Resources' Office of Personnel Investigations. This means that Defendants placed my fingerprints in a database at the Office of Personnel Investigations. The 'Problem Code' is used for employees who have committed what the New York City Department of Education considers misconduct. Therefore the New York City Department of Education has considered Claimant's not getting vaccinated as 'misconduct' which means Claimant can't get a job in New York City, within or outside of the DOE.

Based on the Constitution, both Federal and State, city and State Human Rights Laws, NYS Administrative Code, as well as employment rights under the Collective Bargaining Agreements between the UFT and the DOE, all of my rights have been violated. In addition, many employment applications ask if the applicant has ever been discharged from a job-this question could very well lead to the Claimant having substantial difficulty with gaining employment.

- On February 10, 2023, the NYC Department of Education's COVID Mandate was ended by Mayor Eric Adams.



- On or about February 10, 2023 Claimant became aware that their fingerprints were tagged in the New York City Department of Education's 'Problem Code' at the Human Resources Office of Personnel Investigations, but was never told why. The 'Problem Code' is used for employees who have committed what the New York City Department of Education considers misconduct. Therefore the New York City Department of Education has considered Claimant guilty of some kind of misconduct without giving Claimant a chance to clear the codes from the personnel file and database.

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damages to reputation; emotional distress; impairment of Claimant's ability to secure future employment; impairment of earning power; tortious interference with business relations; malicious prosecution; abuse of process; fraud; and retaliation, defamation, libel, and slander. The claimant remains targeted, ostracized, and punished for not getting the COVID vaccine. The claimant demands that all rights to due process be honored and Claimant is made whole.

The Department has criminalized Claimant's rights to due process. The items of damage or injuries claimed amount to \$6 million dollars

The claim and demand are hereby presented for adjustment and payment.

PLEASE TAKE FURTHER NOTICE that by reason of the foregoing, in default of the City of New York and the listed Defendants to pay the Claimant within the time limit for compliance with this demand by the applicable statutes, Claimant intends to commence an action against the City of New York and the listed Defendants to recover damages with interest and costs.

Dated: 05/01/2023

  
Dianne Baker-Pacius

Signed Before Me on

May 1<sup>st</sup>, 2023

  
Notary Public

FULGENCIO M NEDERLAND  
NOTARY PUBLIC, STATE OF NEW YORK  
01FU0002159  
QUALIFIED IN QUEENS COUNTY  
COMMISSION EXPIRES MARCH 2, 2027